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**SOAH DOCKET NO. 473-22-04394
PUC DOCKET NO. 53719**

APPLICATION OF ENTERGY TEXAS, INC. FOR AUTHORITY TO CHANGE RATES	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**OFFICE OF PUBLIC UTILITY COUNSEL’S
THIRD REQUEST FOR INFORMATION TO
ENTERGY TEXAS, INC.**

Pursuant to 16 Texas Administrative Code (“TAC”) § 22.144, the Office of Public Utility Counsel (“OPUC”) submits this Third Request for Information to Entergy Texas, Inc. (“ETI”). OPUC requests that ETI provide answers to the request for information under oath as required by 16 TAC § 22.144(c)(2)(F) within the timeframe specified in the procedural schedule in this proceeding. OPUC further requests that ETI provide an answer to the questions and sub-questions in the order listed below with sufficient detailed information to provide a complete and accurate answer to each question and sub-question.

Definitions

1. “ETI,” the “Company,” “Applicant,” “You,” and “Your” refer to Entergy Texas, Inc. and its affiliates, subsidiaries, and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.

2. “Document” and “documents” include any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tape, film, electronic facsimile, computer storage device, or any other media, including, but not limited to, electronic mail (e-mail), memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports, summaries of interviews, reports of consultants, appraisals,

forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.

Instructions

1. The Definitions, Instructions, and Claim of Privilege sections set forth in this request for information apply to these questions.
2. In providing an answer to each question, please furnish all of the information that is in your possession, custody, or control, as defined by Texas Rules of Civil Procedure (Tex. R. Civ. Proc.) 192.7(b), including information in the possession, custody, or control of your affiliates, subsidiaries, and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.
3. Please answer each question based upon your knowledge, information, or belief, and state whether each answer is based upon your knowledge, information, or belief.
4. If you have possession, custody, or control, as defined by Tex. R. Civ. Proc. 192.7(b), of an original requested document, please produce the original requested document or a complete copy of the original requested document and all copies that are different in any way from the original requested document, whether by interlineation, receipt stamp, or notation.
5. If you do not have possession, custody, or control of an original requested document, please produce copies of the document, however made, in your possession, custody, or control. If any requested document is not in your possession, custody, or control, please explain why the document is not in your possession, custody, or control and provide the current location and custodian of the requested document or any copy, summary, or other form of the requested document thereof.
6. If there is any confusion about a question, please contact the undersigned counsel for clarification.
7. In providing your response to a question, please start each response on a separate page and type, at the top of the page, the question that is being answered by the response.
8. As part of the response to each question, please state, at the bottom of the answer to the question, the name and job position of each person(s) who participated in any way, other than by providing clerical assistance, in the preparation of the answer to the question. If

the question has sub-parts, please identify each person(s) by name and job position that participated in any way, other than by providing clerical assistance, in the preparation of the answer for each sub-part of the question.

9. Please state the name of the witness in this docket who will sponsor the answer to the question and/or sub-part of the question and who will swear to the truthfulness of the answer to the question and/or sub-part of the question.
10. Please provide individual responses to questions as each response becomes available, rather than waiting to provide all of the responses to the questions at the same time.
11. These questions are continuing in nature. If there is a change in circumstances or facts or if you receive or generate additional information that changes your answer to a question between the time of your original response and the time of the hearing, then you should submit, under oath, a supplemental response to your earlier answer to the question.
12. If you consider any question to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please contact the undersigned counsel, as soon as possible, to discuss the situation and try to resolve the issue. Furthermore, if you object to any question on the grounds that the question seeks confidential information, or on any other grounds, please contact the undersigned counsel, as soon as possible, to discuss the situation and try to resolve the issue.
13. If the response to any question is voluminous, please make available all of the voluminous material at a designated location in Austin. Please provide a detailed index for the voluminous material with your response to the question to enable efficient review of the material. The index should include information sufficient to locate each individual document by page, file, and box number, date of each document, title of each document, description of each document if no document title exists, name of the preparer of each document, and length of each document.
14. If the requested information is included in previously furnished exhibits, workpapers, or responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross-references to the previously furnished information.

15. If a question requests the production of copyrighted material, you may provide a list of such material, including the title, publisher, author, edition, and page references relied on or otherwise relevant to the question.

Claim of Privilege

If any document is withheld under any claim of privilege, please provide a list that identifies each document for which a privilege is being claimed, including the date, sender, recipient(s) of the privileged document, recipient(s) of copies of the privileged document, subject matter of the privileged document, and the basis upon which a privilege is being claimed by the Company.

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- 3-1.** Please refer to the Direct Testimony of Mr. Gary Dickens, page 21. Please confirm or deny that all incentive compensation awarded based on financial performance measures was removed from the total capital costs included in the Application concerning the MCPS generating station. If confirm, provide the amount that was removed from total MCPS capital expenditures. If deny, provide an explanation as to why incentive compensation awarded on the basis of financial performance measures has not been removed from the MCPS capital costs for purposes of determining retail rates.
- 3-2.** Please refer to the Direct Testimony of Mr. Khamsune Vongklamchanh, page 10. As a member of MISO since 2013, has Entergy Texas, Inc. or any of its sister operating companies had to reactivate generation that had been deactivated or retired. If yes, provide the following information with respect to the generation facility that was reactivated due to MISO membership:
- a. Plant station and unit number;
 - b. Current status of plant unit;
 - c. Date of reactivation;
 - d. Length of reactivation;
 - e. MW placed on the MISO transmission grid; and
 - f. Revenue received by ETI or sister company for such reactivation.
- 3-3.** Please refer to the Direct Testimony of Mr. Andrew Dornier, page 12. For the stated year-round No-Notice Supply, provide the underlying development of the 365,000 MMBTU by plant unit at the Sabine generating station.
- 3-4.** Please refer to the Direct Testimony of Mr. Dornier, page 18. Please provide the base target coal inventory and the twelve-month average coal inventory target for Nelson Unit 6 for each of the last five years in terms of days of burn. Please include a description of any changes that have been made to these targeted inventory amounts and the rationale for such changes.
- 3-5.** Please refer to the Direct Testimony of Mr. Dornier, page 19. Please provide the end of year coal inventory target for Big Cajun Unit 3 for each of the last five years in terms of days of burn. Please include a description of any changes in ETIs nominations that have been made to the end of year targeted inventory amounts and the rationale for such changes.

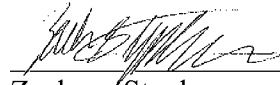
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- 3-6.** Please refer to the Direct Testimony of Ms. Beverley Gale, pp. 7–8. For each of the plant units Nelson Unit 6, Sabine Unit 1, Sabine Unit 3, Sabine Unit 4, and Big Cajun Unit 3, please provide the following information by plant that is included in ETI's requested cost of service:
- a. Gross plant balances at test year end by FERC account;
 - b. Per Books accumulated depreciation at test year end by FERC account;
 - c. Adjusted accumulated depreciation by FERC account;
 - d. Per Books O&M expense at test year end by FERC account;
 - e. Adjusted O&M expense by FERC account;
 - f. Per Book depreciation expense prior to proposed adjustments by FERC account;
 - g. Adjusted depreciation expense after proposed adjustments by FERC account;
 - h. Thirteen-month average value of fuel inventories by fuel type at test year end;
 - i. Non-reconcilable fuel costs at test year end;
 - j. Per Books A&G expense by FERC account at test year end;
 - k. Adjusted A&G expense by FERC account; and
 - l. Other per plant expenses included in the requested cost of service with a detailed description.

Date: August 15, 2022

Respectfully submitted,

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ATTORNEYS FOR THE
OFFICE OF PUBLIC UTILITY COUNSEL

CERTIFICATE OF SERVICE
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I hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 15th day of August 2022 by facsimile, electronic mail, and/or first class, U.S. Mail.



Zachary Stephenson